

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

v.

TRAYDON LAWRENCE,

Defendant.

INFORMATION

23 Cr.

492

COUNT ONE
(Hobbs Act Conspiracy)

The United States Attorney charges:

1. From at least in or about January 2022 through at least in or about June 2022, in the Southern District of New York and elsewhere, TRAYDON LAWRENCE, the defendant, and others known and unknown, knowingly combined, conspired, confederated, and agreed together and with each other to commit robbery, as that term is defined in Title 18, United States Code, Section 1951(b)(1), and would and did thereby obstruct, delay, and affect commerce and the movement of articles and commodities in commerce, as that term is defined in Title 18, United States Code, Section 1951(b)(3), to wit, LAWRENCE conspired with others to rob prospective sellers of Dodge Chargers listed for sale on social media platforms (i) in Wynantskill, New York, on or about January 20, 2022, (ii) in Bristol, Connecticut, on or about March 6, 2022, and (iii) in Fishkill, New York, on or about May 17, 2022; and prospective buyers of a Dodge Charger listed for sale on social media platforms (iv) in Rensselaer, New York, on or about June 14, 2022.

(Title 18, United States Code, Section 1951.)

FORFEITURE ALLEGATION

2. As a result of committing the offense alleged in Count One of this Information, TRAYDON LAWRENCE, the defendant, shall forfeit to the United States, pursuant to Title 18,

United States Code, Section 981(a)(1)(C) and Title 28 United States Code, Section 2461(c), any and all property, real and personal, that constitutes or is derived from proceeds traceable to the commission of said offense, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of said offense and the \$3,780 in United States currency seized from the defendant's residence in Troy, New York, on or about June 14, 2022.

SUBSTITUTE ASSETS PROVISION

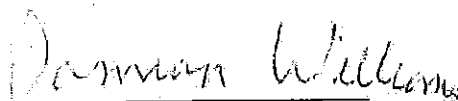
3. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be subdivided

without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p) and Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of the defendant up to the value of the above forfeitable property.

(Title 18, United States Code, Section 981;
Title 21, United States Code, Section 853; and
Title 28, United States Code, Section 2461.)


DAMIAN WILLIAMS
United States Attorney